



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

27 June 1997

Mr. Philip Otis, P.E., Remedial Project Manager
US Department of the Navy, Northern Division
Code 18, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Interim Responses to RIDEM Review Comments
Draft Final Phase III RI - Site 07 - Calf Pasture Point
NCBC Davisville, Rhode Island
Submitted 28 May 1997, Dated May 1997

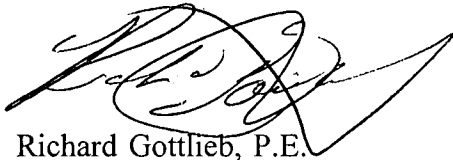
Dear Mr. Otis;

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the above referenced responses to RIDEM comments. In regards to Comment 11 the Navy notes that the 55 ft elevation of the rock outcrop is located more than 400 feet north of the release area and is therefore not considered to be an "adjacent area" with respect to atmospheric mixing. This seems strange since the Navy found it appropriate to mention and include the results of the VOC analysis to a distance of 1000 feet beyond the shoreline of this site which is 2.5 times greater in distance than the 400 feet. Mention the 55 ft elevation of the rock outcrop so the public is aware of this "anomaly" at the site, especially since we make a point of it at many of our meetings.

With respect to comment 13, which stated RIDEM's position that additional data is needed to validate the groundwater model, RIDEM still maintains that additional geologic information is needed to better understand how groundwater is moving under Allen Harbor. This information can be utilized for both Allen Harbor Landfill and Calf Pasture Point. The Navy's response notes that a Long Term Monitoring Plan (LTM) will be prepared as part of the Site 07 Feasibility Study which implies that this issue will be addressed in this document. As you are aware, the Offshore Geotechnical Sampling and Confirmation Study will begin before the finalization of the LTM. Since the equipment necessary to obtain the borings will be available, it is suggested that this information be obtained at this time rather than waiting for the finalization of the LTM. On 25 June 1997 RIDEM sent you a letter which provided potential locations for borings within the harbor. Therefore, RIDEM requests that the geologic information needed under Allen Harbor be obtained as part of the Offshore Geologic studies. In addition, this information can also be used to validate the modeling effort for Allen Harbor Landfill.

RIDEM looks forward to working with the Navy and EPA on the finalization of the Remedial Investigation for Site 07. If you have any questions or require additional information please call me at (401) 277-3872 ext. 7138.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rich Gottlieb', with a large, stylized flourish extending from the end.

Richard Gottlieb, P.E.
Principal Sanitary Engineer

cc: W. Angell, DEM OWM
C. Williams, EPA Region 1
H. Cohen, RIEDC
M. Cohen, ToNK
W. Davis, CSO NCBC
J. Shultz, EA Eng.

letter1.rwg/richg